

**BEFORE THE ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.**

In re:

Powertech (USA) Inc.
Dewey-Burdock Uranium In-Situ
Recovery Project,
Class III Area Permit No.
SD31231-00000; AND
Class V Area Permit No.
SD52173-00000

AFFIDAVIT OF ANDREW CATT-IRON SHELL

I, Andrew Catt-Iron Shell, declare the following based upon my personal knowledge, experience, and belief:

1. I reside in Rapid City, South Dakota. I am over the age of 18 years and competent to testify.
2. I am employed as staff for NDN Collective, Petitioner in this matter. In this capacity I have been authorized to represent NDN Collective.
3. NDN Collective is a nonprofit corporation based in Rapid City, South Dakota that is concerned with building the collective power of Indigenous Peoples, communities, and Nations to exercise our inherent right to self-determination, while fostering a world that is built on a foundation of justice and equity for all people and Mother Earth. Because our organization is staffed overwhelmingly by Indigenous leaders from across the continent and enrolled members of federally-recognized Tribes, our already extant presence in the Indigenous communities we serve also puts us in a unique position to coordinate with Tribal governments and communities in building sustainable outcomes and honoring our human rights. We achieve these outcomes primarily through increasing philanthropic and capital investment in Indigenous-led organizations, policy advocacy, skill-building, agenda setting, activism, and political actions, among other means.
4. I attended the public hearing hosted by the U.S. Environmental Protection Agency in Hot Springs, South Dakota on October 5, 2019 regarding the proposed Dewey-Burdock

underground injection control permits and provided public comments to the agency at that time.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge, information, and belief.

Executed this 12th day of June, 2025, at Rapid City, South Dakota.


Andrew Catt-Iron Shell